



belmont media center

August 4, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: **In the Matter of Accessibility of User Interfaces, and Video Programming Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking (FCC 13-77)**

Dear Commissioners:

Belmont Community Media Center, Inc. (Belmont Media Center) submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by Alliance for Community Media; Alliance for Communications Democracy; Montgomery County, Maryland; the National Association of Counties, National Assoc. of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Belmont Media Center is the non-profit organization that operates the public, educational and government access cable TV channels (3) on which over 600 hours of locally produced programming (live and prerecorded) and 500 hours of regional/national programs per year, and is made available to over **8000** Comcast & Verizon subscribers. This programming includes live TV coverage of public meetings, educational programs, community news and events.

We have program descriptions and accessibility information readily available for programs with accessibility options such as closed captions. However, currently, Comcast's channel descriptions for the three access TV channels includes: "LOCAL 1, LOCAL 2, LOCAL 3" and Verizon's channel description consists of "Belmont Government, Belmont Education, & Belmont Public".

This level of information is inadequate to meet the accessibility goals of the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA).

Viewers cannot determine from Comcast or Verizon's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit comments.

Jeffrey Hansell
Executive Director